

LightGabler LLP

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Attorneys for Defendant

Vital Plus Home Health Care

dba Access TLC Home Health Care

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF VENTURA

LETICIA BONNET, as an individual
and on behalf of others similarly
situated

Plaintiff,

vs.

VITAL PLUS HOME HEALTH CARE,
a California Corporation and dba
Access TLC Home Health Care, and
DOES 1-10, Inclusive,

Defendant.

Case No. 2025CUOE046790

**CLASS ACTION AS TO PLAINTIFF'S FIRST
THROUGH TENTH CAUSES OF ACTION**

**PAGA ACTION AS TO PLAINTIFF'S
ELEVENTH CAUSE OF ACTION**

DECLARATION OF MARY LESTE

Complaint Filed: July 3, 2025

FAC Filed: September 9, 2025

Assigned To: Hon. Charmaine H. Buehner

Department: 44

Hearing Date: July 29, 2026

Hearing Time: 1:30 p.m.

Trial Date: Not Set

DECLARATION OF MARY LESTE

I, Mary Leste, declare as follows:

1. I am over the age of eighteen. I have personal knowledge of the facts set forth herein and, if called and sworn as a witness, I could and would testify competently to such facts.

2. I am a founder and the President of Vital Plus Home Health Care, dba Access TLC Home Health Care, ("Vital Plus" or "the Company") and have held this position since the Company was founded in 2003. In my role as President of Vital Plus, I retain oversight over the Company's business operations, including any legal matters, and the provision of the Company's services to customers and clients.

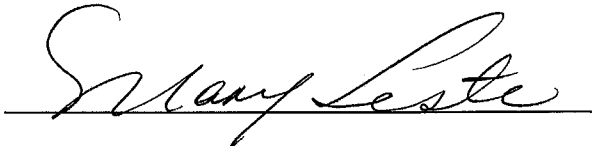
3. On July 10, 2025, Vital Plus received via U.S. Mail a copy of a Private Attorneys General Act ("PAGA") Notice submitted to the California Labor & Workforce Development Agency on behalf of former employee Leticia Bonnet, which alleged various claims for purported violations of the California Labor Code by Vital Plus against Ms. Bonnet and other employees.

4. Subsequently, on July 23, 2025, counsel for Vital Plus – LightGabler LLP – was served by U.S. Mail with a copy of the original Class Action Complaint filed by Ms. Bonnet in this action, which similarly alleged various purported wage-and-hour violations by Vital Plus against Ms. Bonnet and other piece-rate/field employees of the Company.

5. Upon receiving notice of Ms. Bonnet's Class Action lawsuit and PAGA allegations, Vital Plus's Human Resources Department made changes to its wage and hour practices and policies in relation to the Company's piece-rate/field employees. In addition, Vital Plus made retroactive wage adjustment payments to fifty-two (52) employees, including Ms. Bonnet, in November of 2025. The amount of the wage adjustment payments paid by Vital Plus to these employees totaled Eighty-Six Thousand, Nine Hundred and Fifty-Three Dollars and Forty-Five Cents (\$86,953.45). Ms. Bonnet's original Class Action Complaint and PAGA Notice were a catalyst for the changes in policies and practices and the wage adjustment payments undertaken by Vital Plus.

1 I declare under penalty of perjury under the laws of the state of California that the
2 foregoing is true and correct.

3 Executed on April 30, 2026, in Ventura, California.

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7 Mary Leste, President
8 Vital Plus Home Health Care,
9 dba Access TLC Home Health Care
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PROOF OF SERVICE

***Leticia Bonnet v Vital Plus Home Health Care. et al* (Case Number: 2025CUOE046790)**

1. At the time of service, I was a United States citizen, a resident of the County of San Diego, over 18 years of age, and not a party to or interest in this action.

2. My business address is 5060 N. Harbor Drive, Suite 265, San Diego, CA 92106.

3. On **July 2, 2026**, I served the following document(s), including all exhibits thereto:

• **DECLARATION OF MARY LESTE**

4. I served the document(s) on the following:

- LightGabler LLP
Michael H. Brody - mbrody@lightgablerlaw.com
Ryan C. Ely - rely@lightgablerlaw.com
760 Paseo Camarillo, Suite 300
Camarillo, CA 93010
Telephone: (805) 248-7208; Facsimile: (805) 248-7209
- LWDA – Via Online Submission - <https://dir.govfa.net/432>

5. The document(s) were served by the following means:

☒ **BY ELECTRONIC SERVICE** –Based on a court order, court rule, or an agreement of the parties to accept electronic service, I caused such document(s) to be delivered to the person(s) at the electronic service address set forth above. Said document(s) was/were served electronically and the transmission was reported as complete and without error.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on **July 2, 2026**, at San Diego, California.

Diane Richard

Name

/s/ Diane Richard

Signature